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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

No. MD-15-02641-PHX-DGC

MOTION TO FILE UNDER SEAL

(Filed *Ex Parte*)

19 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and
20 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee
21 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and
22 Local Civil Rule 5.6 for leave to file under seal Request to Modify the June 9, 2021 Order
23 and exhibits thereto ("Request").

24 The Request contains confidential information relevant to all fee applicants.
25 Furthermore, as the Court is undoubtedly aware, all filings related to the Common Benefit
26 Fee and Cost Committee have been filed under seal in this litigation. Accordingly, good
27 cause exists for sealing the Notice.
28

1 RESPECTFULLY SUBMITTED this 22nd day of June 2021.

2 BEUS GILBERT MCGRODER PLLC

3 By: /s/ Mark S. O'Connor

4 Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June 2021, I electronically transmitted the attached document to the Court.

/s/ Jessica Gallentine